

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_

**v.** : **DATE FILED:** \_\_\_\_\_

## INDICTMENT

## THE GRAND JURY CHARGES THAT:

1. Abington Guns, 43 Easton Road, Willow Grove, in the Eastern District of Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal law.

2. Mike and Kate's, 7492 Oxford Avenue, Philadelphia, in the Eastern District of Pennsylvania, possessed an FFL and was authorized to deal in firearms under federal law.

3. Firing Line, Inc., 1532 South Front Street, Philadelphia, in the Eastern District of Pennsylvania, possessed an FFL and was authorized to deal in firearms under federal law.

4. FFL holders were licensed, among other things, to sell firearms and ammunition. Various rules and regulations promulgated under the authority of Title 18, United

States Code, Chapter 44 (Sections 921-929), govern the manner in which an FFL holder may sell firearms and ammunition.

5. The rules and regulations governing FFL holders required that a person seeking to purchase a handgun fill out a “Firearms Transaction Record,” ATF Form 4473. Part of the Form 4473 required that the prospective purchaser certify truthfully, subject to penalties of perjury, that he was the actual buyer of the firearm. The Form 4473 contained language warning that “[t]he federal firearms laws require that the individual filling out this form must be buying the firearm for himself or as a gift. Any individual who is not buying the firearm for himself/herself or as a gift, but who completes this form, violates the law.”

6. FFL holders were required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder.

7. On or about the dates specified below, in the Eastern District of Pennsylvania, defendant

**MARK HARGROVE,**

in connection with the acquisition of the firearms listed below from the FFL holders listed below, knowingly made a false statement and representation with respect to the information required by the provisions of Title 18, United States Code, Chapter 44, to be kept in the FFL holders’ records, in that defendant HARGROVE certified on Firearms Transaction Record, ATF Form 4473, that he was buying the firearms listed below for himself, and that he lived at 1240 East Washington Lane, Philadelphia, Pennsylvania, when in fact, as defendant well knew, those statements were false and fictitious.

<b>COUNT</b>	<b>DATE AND FFL</b>	<b>FIREARM(S) PURCHASED</b>
1	April 24, 2006  Abington Guns 43 Easton Road, Willow Grove, PA	1 Beretta Model PX4, .40 caliber pistol, serial number PY07661 1 Taurus model PT945, .45 caliber pistol, serial number NWJ15385
2	December 29, 2006  Mike and Kate's 7492 Oxford Avenue, Philadelphia, PA	1 Beretta Model 92F, 9mm pistol, serial number BER421494
3	January 8, 2007  Firing Line 1532 South Front Street, Philadelphia, PA	1 Inter Dynamics Model KG99, 9mm pistol, serial number 17740
4	February 28, 2007  Firing Line 1532 South Front Street, Philadelphia, PA	1 Glock Model 21, .45 caliber pistol, serial number KDK787

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Section 924(a)(1)(A) as set forth in Counts One through Six of this indictment, defendant

**MARK HARGROVE**

shall forfeit to the United States of America, all firearms involved in the commission of these offenses, including, but not limited to:

- a. 1 Beretta Model PX4, .40 caliber pistol, serial number PY07661
- b. 1 Taurus model PT945, .45 caliber pistol, serial number NWJ15385;
- c. 1 Beretta Model 92F, 9mm pistol, serial number BER421494;
- d. 1 Inter Dynamics Model KG99, 9mm pistol, serial number 17740;
- e. 1 Glock Model 21, .45 caliber pistol, serial number KDK787;

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,

United

States Code, Section 924(d).

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**PATRICK L. MEEHAN**  
**United States Attorney**